

RANDY WILLIAMS
FULL NAME

COMMITTED NAME (if different)

P.O. BOX 7500
FULL ADDRESS INCLUDING NAME OF INSTITUTION

CRESCENT CITY, CALIF, 95532

G-14767
PRISON NUMBER (if applicable)

FILED

2017 JUL -3 AM 11:52

CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

BY [Signature]

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

RANDY WILLIAMS

PLAINTIFF,

v.

M. CONKLE, et. al

DEFENDANT(S).

CASE NUMBER

CV17-4884-JAK(PLA)

To be supplied by the Clerk

CIVIL RIGHTS COMPLAINT

PURSUANT TO (Check one)

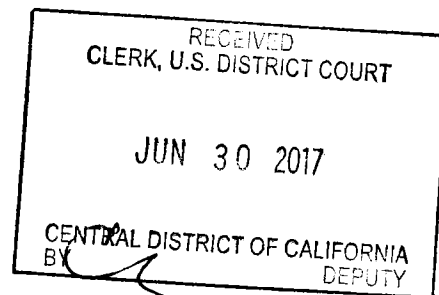
☒ 42 U.S.C. § 1983

☐ Bivens v. Six Unknown Agents 403 U.S. 388 (1971)

A. PREVIOUS LAWSUITS

1. Have you brought any other lawsuits in a federal court while a prisoner: ☐ Yes ☒ No
2. If your answer to "1." is yes, how many? N/A

Describe the lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on an attached piece of paper using the same outline.)



a. Parties to this previous lawsuit:

Plaintiff N/A

Defendants N/A

b. Court N/A

c. Docket or case number N/A

d. Name of judge to whom case was assigned N/A

e. Disposition (For example: Was the case dismissed? If so, what was the basis for dismissal? Was it appealed? Is it still pending?) N/A

f. Issues raised: N/A

g. Approximate date of filing lawsuit: N/A

h. Approximate date of disposition N/A

B. EXHAUSTION OF ADMINISTRATIVE REMEDIES

1. Is there a grievance procedure available at the institution where the events relating to your current complaint occurred? ☒ Yes ☐ No

2. Have you filed a grievance concerning the facts relating to your current complaint? ☒ Yes ☐ No

If your answer is no, explain why not N/A

3. Is the grievance procedure completed? ☒ Yes ☐ No

If your answer is no, explain why not N/A

4. Please attach copies of papers related to the grievance procedure.

C. JURISDICTION

This complaint alleges that the civil rights of plaintiff RANDY WILLIAMS
(print plaintiff's name)

who presently resides at PELICAN BAY STATE PRISON
(mailing address or place of confinement)

were violated by the actions of the defendant(s) named below, which actions were directed against plaintiff at

(LSP-LAC) 44750 both St. Reelwest LANCASTER, CALIF, 93536-7620
(institution/city where violation occurred)

1. Defendant M. CONKLE P.S.Y.D. resides or works at
(full name of first defendant)
(CSP-LAC) 44750 both st. REEL WEST LANCASTER, CA, 93536
(full address of first defendant)
CLINICAL PSYCHOLOGIST
(defendant's position and title, if any)

Explain how this defendant was acting under color of law:

2. Defendant Mintz resides or works at _____
(full name of first defendant)
(CSP-1AC) 44750 both st. Rock West LANCASTER, CA, 93536
(full address of first defendant)
CLINICAL PSYCHOLOGIST
(defendant's position and title, if any)

Explain how this defendant was acting under color of law:

3. Defendant TANG resides or works at _____
(full name of first defendant)
(CSP-4AC) 44750 60TH ST. APT. WEST LANCASTER, CA, 93536
(full address of first defendant)
CLINICAL PSYCHOLOGIST
(defendant's position and title, if any)

Explain how this defendant was acting under color of law:

4. Defendant _____ resides or works at
(full name of first defendant)

(full address of first defendant)

(defendant's position and title, if any)

The defendant is sued in his/her (Check one or both): ☐ individual ☐ official capacity.

Explain how this defendant was acting under color of law:

5. Defendant _____ resides or works at
(full name of first defendant)

(full address of first defendant)

(defendant's position and title, if any)

The defendant is sued in his/her (Check one or both): ☐ individual ☐ official capacity.

Explain how this defendant was acting under color of law:

D. CLAIMS***CLAIM I**

The following civil right has been violated:

DELIBERATE INDIFFERENCE TO SERIOUS MENTAL HEALTH NEED, CONSPIRACY, PERSONAL SAFETY CAUSING INJURIES IN VIOLATION OF THE 8TH AND 14TH AMENDMENT TO THE U.S. CONSTITUTION. INTENTIONAL VIOLATION OF FEDERAL LAWS CAUSING PLAINTIFF INJURIES AND TO SUFFER PSYCHOLOGICALLY.

Supporting Facts: Include all facts you consider important. State the facts clearly, in your own words, and without citing legal authority or argument. Be certain you describe, in separately numbered paragraphs, exactly what each DEFENDANT (by name) did to violate your right.

1.) PLAINTIFF RANDY WILLIAMS WAS AT ALL TIMES MENTIONED HEREIN A PRISONER AT CSP - LOS ANGELES, 2.) PLAINTIFF IS CURRENTLY CONFINED AT PELICAN BAY STATE PRISON, 3.) DEFENDANT DOES 1-3 IS MENTAL HEALTH STAFF FOR CSP - LOS ANGELES WHO AT ALL TIMES MENTIONED HEREIN WAS ASSIGNED AND EMPLOYED AT CSP - IAC AND ACTED UNDER COLOR OF STATE LAW IN THE CAPACITY OF CLINICAL PSYCHOLOGIST, THESE DEFENDANTS IS SUED IN THEIR INDIVIDUAL CAPACITIES. 4.) DEFENDANTS ARE RESPONSIBLE FOR THE CONSTITUTIONAL VIOLATIONS AND DAMAGE TO PLAINTIFF ALLEGED HEREIN. THE TRUE NAMES OF DEFENDANTS ARE PRESENTLY UNKNOWN TO PLAINTIFF. PLAINTIFF IS INFORMED AND BELIEVES AND THEREFORE ALLEGES ON INFORMATION

*If there is more than one claim, describe the additional claim(s) on another attached piece of paper using the same outline.

* (SUPPORTING FACTS CONTINUED) *

AND BELIEF THAT DEFENDANTS IS RESPONSIBLE IN SOME MANNER FOR THE CONSTITUTIONAL VIOLATIONS AND DAMAGES TO PLAINTIFF ALLEGED HEREIN. PLAINTIFF THEREFORE SUES DOES 1 THROUGH 3 BY SUCH FICTITIOUS NAMES AND WILL SEEK LEAVE TO AMEND THIS COMPLAINT TO ADD THE TRUE NAMES OF DEFENDANTS WHEN THE NAMES HAVE BEEN ASCERTAINED.

5.) THIS ACTION ARISES FROM DEFENDANTS DELIBERATE INDIFFERENCE TO PLAINTIFF SERIOUS MENTAL HEALTH NEEDS, CONSPIRACY, PERSONAL SAFETY AND SUBJECTING PLAINTIFF TO CRUEL AND UNUSUAL PUNISHMENT CAUSING PLAINTIFF TO SUFFER INJURIES AND EXTREME PAIN WHICH DID NOT SERVE A LEGITIMATE PENOLOGICAL INTEREST OR INSTITUTIONAL GOALS WHICH VIOLATED AND INFRINGED UPON MY 8th AND 14th AMENDMENT CONSTITUTIONAL AND FEDERAL STATUTORY RIGHTS.

(supporting facts continued)

6.) PLAINTIFF IS A MENTAL HEALTH PATIENT WHO SUFFER BIPOLAR, DEPRESSION, PARANOIDIA AND OTHER SYMPTOMS ASSOCIATED WITH BIPOLAR.

7.) PLAINTIFF HAS A EXTENSIVE MENTAL HEALTH HISTORY WITH A DOCUMENTED RECORD OF ADMISSIONS TO MENTAL HEALTH CRISES BEC FOR SUICIDE ATTEMPTS AND SUICIDE IDEATIONS DEFENDANTS WERE AWARE OF.

8.) ON JULY 13, 2015 PLAINTIFF WAS VERY DEPRESSED AND FEELING SUICIDAL IN WHICH PLAINTIFF INFORMED THE UNIT OFFICER.

9.) DEFENDANT CONKLE WAS NOTIFIED BY THE UNIT CORRECTIONAL OFFICER THAT PLAINTIFF REPORTED BEING SUICIDAL.

* (supporting facts continued) *

- 10.) PLAINTIFF WAS PUT INTO THE UNIT SHOWER BY STAFF TO AWAIT TO BE SEEN BY A CLINICIAN.
- 11.) DEFENDANT CONKLE CAME TO THE UNIT SHOWER WHERE PLAINTIFF WAS LOCATED IN WHICH PLAINTIFF TOLD DEFENDANT CONKLE THAT HE WAS DEPRESSED AND FEELING SUICIDAL AND TOLD DEFENDANT CONKLE HIS PLAN FOR KILLING HIMSELF.
- 12.) PLAINTIFF FURTHER TOLD DEFENDANT CONKLE THAT HE TOLD DEFENDANT TANG EARLIER ON JULY 13, 2015 THAT HE WAS SUICIDAL AND NOTHING WAS DONE.
- 13.) PLAINTIFF WHILE IN A DEPRESSIVE STATE ON JULY 13, 2015 ALSO TOLD DEFENDANT TANG THAT HE WAS FEELING SUICIDAL AND VERY DEPRESSED IN WHICH DEFENDANT TANG HAD PLAINTIFF RETURNED TO HIS CELL WITHOUT BEING ADMITTED TO A MENTAL HEALTH CRISIS BED.

(supporting facts continued)

- 14.) Although plaintiff notified defendants CONKLE AND TANG that he was depressed and feeling suicidal with a plan to kill himself they purposefully denied and allowed plaintiff to be denied adequate mental health treatment by not adequately responding to plaintiff's serious need for mental health treatment.
- 15.) Later on July 13, 2015 after plaintiff notified both defendants CONKLE AND TANG that he was very depressed and feeling suicidal, plaintiff cut his left wrist in a attempt to kill himself.
- 16.) Plaintiff suffered excruciating pain in his left wrist during the time and after he cut his wrist and suffered psychologically.

(supporting facts continued)

- 17.) DEFENDANTS CONKLE AND TANG CHOSEN COURSE OF TREATMENT WAS MEDICALLY UNACCEPTABLE UNDER THE CIRCUMSTANCES, AND WAS CHOSEN IN CONSCIOUS DISREGARD OF AN EXCESSIVE RISK TO PLAINTIFF'S HEALTH.
- 18.) DEFENDANTS CONKLE, TANG AND MINTZ CONSPIRED TOGETHER ON JULY 13, 2015 TO DENY PLAINTIFF ADEQUATE MENTAL HEALTH TREATMENT TO CAUSE PLAINTIFF HARM BY MEETING AND AGREEING TO DENY PLAINTIFF TO BE ADMITTED TO A MENTAL HEALTH CRISIS BED AND TO ALLOW PLAINTIFF TO ~~harm~~ HARM HIMSELF AS A RESULT OF DETERIORATING MENTAL HEALTH.
- 19.) DEFENDANT CONKLE CONTACTED AND CONSULTED WITH DEFENDANTS TANG AND MINTZ ON JULY 13, 2015 RELATED TO PLAINTIFF THAT RESULTED IN PLAINTIFF BEING DENIED ADEQUATE MENTAL HEALTH CARE.

* (SUPPORTING FACTS CONTINUED)*

20.) DEFENDANTS AND ALL OF THEM WAS DELIBERATE INDIFFERENT TO PLAINTIFF'S SERIOUS MENTAL HEALTH CARE NEEDS AND ACTED WITH A CULPABLE STATE OF MIND TO A FORESEEABLE RISK TO MY HEALTH AND SAFETY AND DISREGARDED THOSE RISKS BY REFUSING TO TAKE REASONABLE MEASURES TO ABATE THEM.

21.) DEFENDANTS KNOWINGLY FAILED TO ADEQUATELY RESPOND TO PLAINTIFF'S REQUEST FOR MENTAL HEALTH TREATMENT WHEN PLAINTIFF NOTIFIED DEFENDANTS AND DEFENDANTS WAS AWARE PLAINTIFF WAS DEPRESSED AND FEELING SUICIDAL CAUSING PLAINTIFF TO SUFFER THE UNNECESSARY AND WANTON INFLICTION OF PAIN AND TO SUFFER INCREASED PSYCHOLOGICALLY.

(supporting facts continued)

26.) DEFENDANTS AND ALL OF THEM ACTING UNDER COLOR OF STATE LAW, WILLFULLY, INTENTIONALLY, KNOWINGLY, AND CONCERTEDLY DEPRIVED PLAINTIFF OF RIGHTS, PRIVILEGES AND IMMUNITIES SECURED BY THE CONSTITUTION AND LAWS OF THE UNITED STATES INCLUDING THE 8th AND 14th AMENDMENTS AND SUBJECTING PLAINTIFF TO CRUEL AND UNUSUAL PUNISHMENT AND INFRINGEMENT UPON HIS CONSTITUTIONAL AND FEDERAL STATUTORY RIGHTS.

E. REQUEST FOR RELIEF

I believe that I am entitled to the following specific relief:

1.) AWARDED REASONABLE FEES AND COSTS ATTORNEYS
FEES, 2.) COMPENSATORY DAMAGES OF \$75,000
FROM DEFENDANTS AND ALL OF THEM TO PLAINTIFF,
3.) PUNITIVE DAMAGES OF \$50,000 FROM DEFENDANTS
AND ALL OF THEM TO PLAINTIFF TO SET AN EXAMPLE
AND TO DETER those IN THE FUTURE FROM BEHAVING AS
HAVE DEFENDANTS.

6-26-17
L. [Signature]
(Date)

[Signature]
(Signature of Plaintiff)

"DEMAND FOR JURY TRIAL"

I DEMAND A JURY TRIAL FOR ALL CLAIMS FOR
WHICH A JURY TRIAL IS ALLOWED.

DATE: 6-26-17
~~6-26-17~~

Willie Lee
- PLAINTIFF -

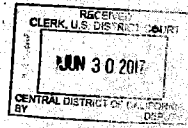
"VERIFICATION"

I AM the PLAINTIFF IN the ABOVE ENTITLED ACTION.
I HAVE READ the FOREGOING COMPLAINT AND KNOW
the CONTENTS thereof. THE SAME IS TRUE OF MY OWN
KNOWLEDGE, EXCEPT AS TO THOSE MATTERS WHICH
ARE THEREIN ALLEGED ON INFORMATION AND
BELIEF, AND AS TO THOSE MATTERS, I BELIEVE IT
TO BE TRUE. I DECLARE UNDER PENALTY OF PERJURY
THAT THE FOREGOING IS TRUE AND CORRECT.

Dated: ~~6-26-17~~
6-26-17

William M. Miller

Randee Williams
#G14767
CSP-SAC
P.O BOX 290066
Repres, CA 95671



(CV)

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Mail

RECEIVED
JUN 27 2017
CSP-SAC MAILROOM

Central District of California
U.S. Courthouse
312 N. Spring Street
Los Angeles, CA 90012

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